



October 10, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90
Comments on Preliminary Determination of Rate-of-Return Study Areas
100 Percent Overlapped by Unsubsidized Competitors

On August 11, 2017, the Wireline Competition Bureau ("Bureau") released its preliminary determination of rate-of-return study areas that are 100 percent overlapped by an unsubsidized competitor.¹ Vantage Point Solutions, a consultant for Farmers Telephone Co-Batavia ("Batavia"), files these comments to dispute the Bureau's preliminary determination.

In the Public Notice, the Bureau preliminarily determined Batavia's study area in Iowa (SAC:351175) is 100% overlapped by an unsubsidized competitor with qualifying service at rates that are comparable to those in urban areas, Natel. Currently, \$77.98 is the benchmark for service at 10/1 Mbps, with unlimited usage.¹ Additionally, fixed voice services were not available at one of the locations requesting service. As shown in sworn statements by Mark Willhoit and Greg Adam, who made preliminary inquiries regarding Natel's service in Batavia's study area and found that Natel is unable to provide qualified service to all locations in at least two census blocks (191799611003048 and 191799601001052). Please see the following two sworn statements as evidence.

For the reasons set forth herein, Vantage Point Solutions on behalf of Batavia submits that the Bureau's determination is incorrect. This evidence indicates Batavia is not 100% overlapped by an unsubsidized competitor and not subject to the elimination of high-cost universal service as adopted in the 2011 USF/ICC Transformation Order.

Regards,

/s/ Heath Koth

Heath Koth
Senior Financial Analyst
Vantage Point Solutions

¹ Public Notice, DA 17-760, August 11, 2017

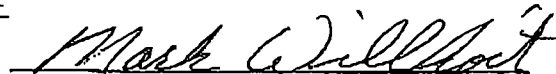
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	WC Docket No. 10-90
Wireline Competition Bureau)	
Publishes Preliminary Determination)	
of Rate-of-Return Study Areas 100 Percent)	
Overlapped by Unsubsidized Competitors)	

SWORN STATEMENT OF MARK WILLHOIT

I, Mark Willhoit, being of lawful age and duly sworn, state as follows:

1. My name is Mark Willhoit.
2. At 11:00 am on 2/1/2017, I called Natel to inquire about getting service at 1213 Batavia Rd, IA 52533. I have attached my notes from my call with Natel Representative, Linda, and have labeled it "Attachment A."
3. I called the Natel Customer Service Representative number 641-469-6220.
4. I spoke with Linda regarding Natel's voice service and she responded that Natel does not offer voice services.
5. Additionally, Linda informed me I have 4 residential service options:
 - 2 Mb for \$29
 - 4 Mb for \$55
 - 6 Mb for \$65
 - 10 Mb for \$127.
6. This completes my Sworn Statement.



Mark Willhoit

Declarant



Field Tester Instructions and Call Notes

Thank you for helping your local telecommunications company to test competitor service. If you have any questions about this process, please contact Jesse Taylor at Vantage Point Solutions (jesse.taylor@vantagepnt.com, 605-995-1777).

Your goal is to secure service without revealing to the competitor that this is part of a test. Take good notes while you are on the phone. After the testing is completed, Vantage Point Solutions will type up your notes and will file them with regulators.

Competitor
Natel

Phone Number
641-469-6220

Name Mark Gillhoist Address 1213 Batavia Rd
Date 2-1-2017 Time 11:00 Am

*Ask CSR for name and call back number (in case call is dropped)

CSR Name Linda CSR Extension Number 118

1. Opening

Let the customer service representative (CSR) know you are interested in getting Internet service and are exploring your options. Ask if they provide service for your town. They will probably ask for your name and address. Feel free to provide that information.

The CSR may indicate they cannot provide service in your area. If this is the case, complete this section:

☐ CSR indicated they cannot provide service in my area.

Reason given: _____

Also, ask if they have any system upgrades or expansions planned in your area. Record what he/she tells you. _____

3.
5.
10.

2. Identifying Options

Ask the CSR what Internet speed packages (upload and download speeds) and prices they offer.
Record what he/she tells you. _____

2 meg	
4 meg	55.00
6 meg	65.00
10 meg	127.00

If they don't mention one, ask if there is a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, tell the CSR you were looking for at least this speed, thank them for their time and hang-up. Call completed at (time): _____

If YES, continue with the call.

3. Terms and Conditions

Ask the CSR for information on these items:

Is there an installation fee? How much?

199.00

Do you have to purchase equipment? How expensive? How will it be installed?

The 199.00 includes equipment but we would not own it.

Is there a cancellation fee? How expensive?

1 year contract

Do any of these costs get better with a longer-term contract? How so?

Are there any money back guarantees? What are the details?

4. Service Quality

Ask the CSR for information on service quality. For example: "Do you have good service for my location?" "Where is the tower that would serve my home?"

5. Voice Service

Ask the CSR if you would be able to get telephone service and a phone number.

☐ Yes, they have voice service.

☒ No, they do not have voice service.

If YES, Ask the CSR if you would be able to keep your current phone number.

☐ Yes, I can keep my phone number.

☐ No, I cannot keep my phone number.

Do not sign up for voice service. If they press, remind the CSR you are just exploring your options right now.

6. Service Timing

Ask the CSR when they would be able to get you connected. Record what they tell you.

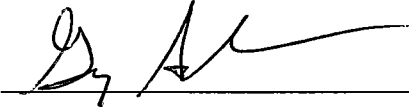
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SWORN STATEMENT OF GREG ADAM

I, Greg Adam, being of lawful age and duly sworn, state as follows:

1. My name is Greg Adam.
2. At 9:15 am on 11/16/16, I called Natel to inquire about getting service at 1095 50th St Batavia, IA 52533. I have attached my notes from my call with Natel Representative, Linda, and have labeled it "Attachment A."
3. I called the Natel Customer Service Representative number 641-469-6220.
4. I spoke with Linda who informed me I have a 10 Megabit service option for \$127.
5. The call ended at 9:22 am.
6. This completes my Sworn Statement.



Greg Adam
Declarant

10-10-17



Field Tester Instructions and Call Notes

Thank you for helping your local telecommunications company to test competitor service. If you have any questions about this process, please contact Jesse Taylor at Vantage Point Solutions (jesse.taylor@vantagepnt.com, 605-995-1777).

Your goal is to secure service without revealing to the competitor that this is part of a test. Take good notes while you are on the phone. After the testing is completed, Vantage Point Solutions will type up your notes and will file them with regulators.

Competitor
Natel

Phone Number
641-469-6220

Name Greg Adam Address 1095 50th St Batavia
Date 11-16 Time 9:15

*Ask CSR for name and call back number (in case call is dropped)

CSR Name Linda CSR Extension Number _____

1. Opening

Let the customer service representative (CSR) know you are interested in getting Internet service and are exploring your options. Ask if they provide service for your town. They will probably ask for your name and address. Feel free to provide that information.

The CSR may indicate they cannot provide service in your area. If this is the case, complete this section:

☐ CSR Indicated they cannot provide service in my area.

Reason given: _____

Also, ask if they have any system upgrades or expansions planned in your area. Record what he/she tells you. _____

2. Identifying Options

Ask the CSR what Internet speed packages (upload and download speeds) and prices they offer.
Record what he/she tells you. yes can offer 2-4/6

asked for 10

10 yes \$127 res

if the band width is high enough
so make

If they don't mention one, ask if there is a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, tell the CSR you were looking for at least this speed, thank them for their time and hang-up. Call completed at (time): _____

If YES, continue with the call.

3. Terms and Conditions

Ask the CSR for information on these items:

Is there an installation fee? How much?

149

Do you have to purchase equipment? How expensive? How will it be installed?

eq. inc. included

Is there a cancellation fee? How expensive?

min 1 yr

Do any of these costs get better with a longer-term contract? How so?

Are there any money back guarantees? What are the details?

4. Service Quality

Ask the CSR for information on service quality. For example: "Do you have good service for my location?" "Where is the tower that would serve my home?"

depends on signal

5. Voice Service

Ask the CSR if you would be able to get telephone service and a phone number.

☒ Yes, they have voice service. but not good

☐ No, they do not have voice service.

If YES, Ask the CSR if you would be able to keep your current phone number.

☒ Yes, I can keep my phone number. \$7 port fee

☐ No, I cannot keep my phone number.

Do not sign up for voice service. If they press, remind the CSR you are just exploring your options right now.

6. Service Timing

Ask the CSR when they would be able to get you connected. Record what they tell you.

If they give you only a general answer, ask them how long it normally takes them to connect someone once service is ordered. Record what they tell you.

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7. Call Conclusion

Do not sign-up for Internet service at this time. Thank the CSR for their time, and tell them you want to finish exploring your options and will get back to them. If they ask you who else you may have contacted, tell them they are the first you have called.

Call completed at (time): 9:22

8. Reporting Back Your Information

Call or email Jesse Taylor at Vantage Point Solutions to provide the information you have gathered:
Jesse Taylor, 605-995-1777, jesse.taylor@vantagepnt.com

If they give you only a general answer, ask them how long it normally takes them to connect someone once service is ordered. Record what they tell you.

7. Call Conclusion

Do not sign-up for Internet service at this time. Thank the CSR for their time, and tell them you want to finish exploring your options and will get back to them. If they ask you who else you may have contacted, tell them they are the first you have called.

Call completed at (time): _____

8. Reporting Back Your Information

Call or email Jesse Taylor at Vantage Point Solutions to provide the information you have gathered:

Jesse Taylor, 605-995-1777, jesse.taylor@vantagepoint.com